

EXHIBIT U

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03-md-1570 (GBD)(SN) ECF Case |
| This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i> | 15-cv-9903 (GBD) (SN) ECF Case |

DECLARATION OF GLENN SAVERY

I, Glen Savery, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center Towers when the terrorist attack occurred. At the time of the attack, I was working as a Field Manager of Security Services for Summit Security Services on the B-2 L level of World Trade Center Towers II. Proof of presence is attached as Exhibit B.

4. I was in New York City at Ground Zero when the planes hit the towers and I received physical injuries in the escape and collapse. When I heard an explosion in our building, I ran to the lobby to investigate with my immediate supervisor, Mr. Horner. I radioed all of our other

security officers under my command to help people evacuate the building. After I cleared the lobby, I ran to the concourse level and evacuated residents through building five. I felt the buildings coming down and I escaped. The debris and force of the building coming down threw me across the street. In the process, I had my head and chest struck and jolted my lower back. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. My narrative of the events from the day is attached as Exhibit C.

5. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: Lumbar derangement, radiculopathy lumbosacral, TR myofascitis lumbar spine, chest wall contusion, PTSD, post-concussion syndrome with moderate cognitive deficiency, vertigo, tinnitus, vestibular contusion and costochondritis.

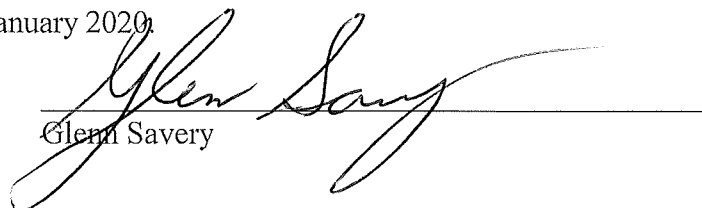
6. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from PTSD, anxiety and bouts of depression due to the traumatic events of these terrorist attacks. I witnessed my boss die right next to me and am still haunted by the fact it could have been me. Often I suffer from sleep apnea because of the images from September 11, 2001 that appear in my dreams and require medication to help me stay asleep. I am often emotional and angry due to my PTSD. I will never be able to forget the horrors I experienced that day and I will never be the same.

7. I sought medical attention for my injuries. Attached as Exhibit D to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks. I still require treatment for my lumbar derangement and other back complications. As a result of the blunt trauma to my head, the tinnitus and cognitive deficiencies regularly detract from my ability to complete everyday tasks.

10. I previously pursued a claim (Claim Number VCF 212-001274) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 20 day of January 2020.


Glenn Savery

Exhibits Filed Under Seal